

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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|--------------------------|---|----------------------------|
| _____ |) | CRIMINAL NO.: 04CR10060RCL |
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | |
| |) | |
| GEORGE SCHUSSEL |) | |
| _____ |) | |

UNOPPOSED MOTION TO CLARIFY CONDITIONS OF RELEASE

Now comes the defendant, George Schussel, who, through his counsel, moves that this Honorable Court clarify the conditions of release set on March 8, 2004, by maintaining the current travel restriction to the United States as is set in paragraph 7 (c) of the Order of Release, but clarifying that notice to Pretrial Services, setting forth the dates and locations of such travel outside New Hampshire and Massachusetts, be given within 48 hours of such travel, rather than the 14 days currently required by Pretrial Services. This motion is not opposed by the Government. The reason for this motion is as follows:

- (1) Pretrial Services is currently interpreting the defendant's Order of Release to mandate 14 days notice for travel outside the two designated locations;
- (2) The defendant intends to pursue business opportunities including consulting that will require out of state travel for which he cannot give the particulars to Pretrial Services 14 or more days in advance;

(3) Given the other conditions of release, including a personal bond of \$10,000,000.00, the objectives of pretrial release can be satisfied without the 14 day notice practice; and

(4) The defendant requests that a 48-hour notice to Pretrial Services be ordered to supplement paragraph 7 (c) of the Order of Release.

Respectfully submitted,
BY HIS ATTORNEYS,

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DATE: August 17, 2004